

REMARKS

Referring to the Office action mailed October 27, 2008, Applicants have carefully studied the Examiner's rejections to the pending claims, and have responded accordingly thereto.

Claims 15-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Johnson et al. (US 6,424,804) in view of Osada et al. (US 5,569,350). The rejection of the aforementioned claims is hereby traversed in view of the following discussion and previous amendments to independent claims 15 and 27.

The Examiner indicates that Johnson et al. discloses a system having a mounting structure 32, within a body and doors 51. The system allegedly has a platform 14 where a camera/sensor 12 is mounted, linear guide 24 that is engaged by the platform that is a linear structure disposed in parallel to the linear movement path of the platform, and mechanism 30, 31 for moving the platform. The Examiner further indicates that the camera 12 is directly attached to the platform 14 as shown in Figure 6. The alleged

linear guide is connected to the mounting structure at a first end and to the platform at the second end. The alleged linear guide is engaged by an annular engagement structure 26 that is connected to the platform and to stabilize the platform in an atmosphere. The Examiner concedes that Johnson et al. is silent on the alleged platform being engaged to a threaded screw.

The Examiner indicates that Osada et al. teaches a mechanism that utilizes a threaded screw 17 that engages the platform 8, 26 is well known in the art. The Examiner further alleges that Osada et al. teaches a motor 18 used to actuate the threaded screw is well known and refers to Figure 7. Thus, the Examiner alleges it would have been obvious to one skilled in the art at the time the invention was made to have used a motor control threaded screw that engages the platform of Johnson et al. as taught by Osada et al. as a substitution of parts.

Applicants respectfully submit, however, that Johnson et al. in view of Osada et al. does not describe or suggest such a

combination.

As previously argued, Johnson et al. does not describe or suggest a linear guide engaged by any annular engagement structure connected to the platform, which engages a threaded screw, as required by previously presented claims 15 and 27. Johnson et al. does describe linear bearings 26, which are not the structural or functional equivalent of the annular engagement structure (element 122 - Figure 2) of Applicants' invention. The linear bearings 26 are positioned *around* the periphery of the tracking plate 14 of Johnson et al. and are not connected to the platform 14, which engages a threaded screw, to stabilize and direct linear movement of the platform in an atmosphere as in Applicants' invention.

Moreover, as shown and described in Johnson et al., the alleged linear guide 24 is not a linear guide, but rather functions structurally as a *subassembly* or *frame member* that protrudes into the atmosphere without the added protection of a linear guide. The linear guide of Applicants' invention is a

stabilizer over and above the subassembly or frame member of Johnson et al. in that the former helps to prevent deflection of the platform when the platform is extended in an atmosphere.

Applicants further submit in Johnson et al. the camera/sensor 12 is not mounted to the tracking plate 14, but rather sleeve 34 is attached to the bottom of the tracking plate 14 as shown in Figure 5. The sleeve 34 attaches to the camera protective housing of the camera/sensor 12. Applicants' invention is not shown by Figure 5 or described with respect to Figure 5.

Further, unlike Applicant's invention, Johnson et al. does not teach the use of "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform, which engages a threaded screw, . . . ." Accordingly, Applicants have previously amended claims 15 and 27 to reflect the aforementioned differences between Applicants' invention and

Johnson et al.

Furthermore, regarding the Examiner's reliance on Osada et al. in combination with Johnson et al., Applicants respectfully submit that Osada et al. is not in the same field of technology as Applicants' invention and hence is not an appropriate reference to rely on in rejecting the subject claims. The claimed invention of Osada et al. is for a mechanism and method for mechanically removing a substrate, such as a semiconductor substrate, used in the manufacturing industry. This is clearly not in the same field of technology as Applicants' invention, which is an aircraft imaging system in the aerospace industry. Accordingly, it would not have been obvious for one of ordinary skill in the art at the time the invention was made to use a motor controlled threaded screw in combination with Johnson et al., which does not describe or suggest Applicants' invention, as a substitution of parts.

//

//

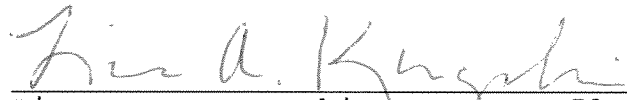
The Examiner further indicates as for the mechanism that is electrically, hydraulically, magnetically, pneumatically, linear motion screw, or clutch and brake driven, it would have been obvious to one skilled in the art to have used any mechanism that is needed to drive the platform. However, Johnson et al. in view of Osada et al. does not disclose "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform, which engages a threaded screw, . . .", as required by independent claims 15 and 27. Accordingly, favorable reconsideration and withdrawal of this rejection is respectfully requested.

Claims 16-26 and 28-36 depend on independent claims 15 and 27, respectively, as traversed above, and, thus, the rejection with respect to them is moot.

//

Applicant respectfully requests that the Examiner consider the arguments and previous amendments to the claims and pass this case to issue.

Respectfully submitted,

  
\_\_\_\_\_  
Lisa A. Karczewski, Reg. No. 53,096

CHAN LAW GROUP LLP  
1055 West Seventh Street, Suite 1880  
Los Angeles, CA 90017-2544  
(213) 624-6560 x115 Telephone  
(213) 622-1154 Facsimile